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August 7, 2013

VIA ELECTRONIC REQUEST

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (OPPA-2)
San Francisco, CA 94105
Fax: (415) 947-3591

Re: Freedom of Information Act Request

Charles Tyrone Hill et al v. Air & Liquid Systems Corp., et al.

United States District Court- Central District Case No. CV-12-08713 DJF

Our Client: John Crane Inc. ("JCI")

Dear FOIA Coordinator:

We are requesting the disclosure of the following records pursuant to the Freedom of Information Act (5 USCS § 552), within the next twenty business days. All requested records pertain to the following locations, collectively referred to as the Premises:

- National Steel & Shipbuilding Co., San Diego, CA from 1960-1970
- Campbell Machine Shipyard, San Diego, CA from 1966-1970
- Triple A South Shipyard, San Diego, CA from 1972-1975

(1) Any records or documents¹ pertaining to the construction, maintenance, rebuilding, repairs/remodeling work and/or abatement work performed on the Premises, which in any way involved asbestos.

¹ The term "record" and the term "document" are used in the broadest sense possible and mean the original and any non-identical copy (e.g., any copy which is different from the original in any way) of any written, recorded, printed, typewritten, or handwritten matter of any kind or nature (however produced, reproduced, or recorded), including but without limitation, all blueprints, work specifications, daily reports, time cards, letters, telegrams, e-mail, facsimiles, memoranda, reports (preliminary and final), studies, samples, testing protocols, diaries, logs, maps, pamphlets, notes, charts, graphs, calendars, schedules, tabulations, analysis, statistical information, accumulations, books, magazines, telephone bills, minutes, summaries, or other records of meetings, conversations, and hearings of any kind, photographs, slides, videotapes, film impressions, data, data compilations, computer files, computer documents, audiotape recordings, magnetic tapes, sound or mechanical reproductions, computer printouts, contracts, drafts of contracts, leases, subleases, instruments, agreements, warnings, directives, instructions, citations, violations, drawings, hearing transcripts, reports, summaries of investigations or negotiations, opinions or reports of consultations, consultants, or proposed experts, and press releases, now or at any time in the Environmental Protection Agency's possession, custody, or control or known or believed by the Environmental Protection Agency

(2) Any records or documents identifying any and all persons, contractors, or other entities who performed construction, maintenance, rebuilding, repair/remodeling, and/or abatement work on the Premises, which in any way involved asbestos.

(3) Any records or documents pertaining to any asbestos abatement work performed on the Premises.

(4) Any records or documents regarding research, investigations, air testing, reports and/or study data from air testing and air sampling which measured the amount of asbestos fiber either in the ambient air and/or released when asbestos was used, machined, operated, or otherwise disturbed on the Premises.

(5) Any records, documents, or letters from the Environmental Protection Agency pertaining to warnings, citations, or violations at the Premises, which in any way involved asbestos.

(6) Any records or documents, including but not limited to reports, studies, and/or secondary research provided by the Environmental Protection Agency, which addressed the issue of health hazards created by or associated with exposure to asbestos.

(7) Any written communication from the Environmental Protection Agency to the Premises, which in any way involved asbestos.

5 USCS § 552(b) allows you to segregate material that is exempt from material that is not exempt. If you determine that some portion of the requested documents is exempt, please provide me with the remainder of the documents. If you determine that some of the documents are exempt from release, please provide the justification for withholding such documents. I reserve the right to appeal any such determination.

Also, please provide certification, under seal of your office, that any documents produced are records of the Environmental Protection Agency where records of its nature are kept.

I agree to pay the reasonable costs involved in retrieving and copying the records requested. If there is a charge for this information, please inform me if the charge exceeds \$100.00.

As provided in 5 USCS § 552, I expect to receive a reply to my request within twenty (20) business days. If you have any questions, please feel free to contact me at 213-486-8031.

Sincerely,

**HAWKINS PARNELL
THACKSTON & YOUNG LLP**

David E. Ashdown
Paralegal

to exist or have existed. "Record" or "document" also includes any underlying documents used to create summaries or other reports of financial or other data.